

WINDELS MARX LANE & MITTENDORF, LLP

156 West 56th Street
New York, New York 10019
Tel: (212) 237-1000
Fax: (212) 262-1215
Howard L. Simon
Kim M. Longo
Yani Indrajana Ho

*Special Counsel to Irving H. Picard, Trustee for the
Substantively Consolidated SIPA Liquidation of
Bernard L. Madoff Investment Securities LLC and
Bernard L. Madoff*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation of
Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

ANNE SQUADRON, ANNE STRICKLAND
SQUADRON, SETH SQUADRON, ELIZABETH
SQUADRON, DANIEL SQUADRON, WILLIAM
SQUADRON, DEBRA LAGAPA, RICHARD
SQUADRON, THEODOSIA PRICE, DIANE
SQUADRON, THOMAS SHEA, PETER GOLD,
CAROL GOLD, SARAH D. GOLD, SWING
HARRE, DAVID HARRE, VANESSA N. GANG,
ANNA ROTHWELL, ROBERT VAS DIAS and
MARGARET BUTCHER,

Defendants.

Adv. Pro. No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

Adv. Pro. No. 10-05164 (SMB)

**STIPULATION AND ORDER EXTENDING TIME TO SELECT A
MEDIATOR**

Irving H. Picard (the “Trustee”), as trustee for the liquidation of the business of Bernard L. Madoff Investment Securities LLC and the substantively consolidated estate of Bernard L. Madoff under the Securities Investor Protection Act, 15 U.S.C. §§ 78aaa, *et seq.* (“SIPA”), individually, by and through his special counsel, Windels Marx Lane & Mittendorf, LLP, and defendants Anne Squadron, Anne Strickland Squadron, Seth Squadron, Elizabeth Squadron, Daniel Squadron, William Squadron, Debra Lagapa, Richard Squadron, Theodosia Price, Diane Squadron, Thomas Shea, Peter Gold, Carol Gold, Sarah D. Gold, Swing Harre, David Harre, Vanessa N. Gang, Anna Rothwell, Robert Vas Dias, and Margaret Butcher, (together, the “Defendants”), by and through their counsel, Lax & Neville LLP (collectively, the “Parties”), represent as follows:

WHEREAS, on November 10, 2010, this Court entered the Order (1) Establishing Litigation Case Management Procedures for Avoidance Actions and (2) Amending the February 16, 2010 Protective Order (the “LPO”) [Adv. Pro. No. 08-01789 (SMB), Dkt. No. 3141]; and

WHEREAS, the Trustee commenced this action (the “Adversary Proceeding”) by filing a complaint (the “Complaint”) on December 3, 2010 [Dkt. No. 1]; and

WHEREAS, pursuant to the Notice of Applicability filed by the Defendants in this Adversary Proceeding on January 31, 2011 [Dkt. No. 5], the LPO and the avoidance procedures contained therein (the “Avoidance Procedures”) are applicable to the instant matter; and

WHEREAS, on April 17, 2014, the Defendants filed a motion to dismiss in this Adversary Proceeding [Dkt. No. 34]; and

WHEREAS, on April 29, 2014, the Trustee filed a Notice of Mediation Referral in this Adversary Proceeding [Dkt. No. 35];

WHEREAS, under the Avoidance Procedures, “[w]ithin 14 calendar days after the filing of the Notice of Mediation Referral, the Trustee and [Defendants] shall choose a mediator” (the “Mediator Selection Period”) in accordance with General Order M-390, “which is available on the Bankruptcy Court’s website: (www.nysb.uscourts.gov)”; and

WHEREAS, the Parties have agreed to extend the Mediator Selection Period in this Adversary Proceeding, which would otherwise end on May 13, 2014;

NOW, THEREFORE, the Parties stipulate and agree to, and the Court **ORDERS**, the following:

1. The Mediator Selection Period is hereby extended to May 20, 2014, or 7 calendar days after May 13, 2014.

Dated: New York, New York
May 12, 2014

By: /s/ Howard L. Simon
Howard L. Simon (hsimon@windelsmarx.com)
Kim M. Longo (klongo@windelsmarx.com)
Yani Indrajana Ho (yho@windelsmarx.com)
Windels Marx Lane & Mittendorf LLP
156 West 56th Street
New York, New York 10019
Tel: (212) 237-1000
Fax: (212) 262-1215

*Special Counsel to Irving H. Picard, Trustee for
the SIPA Liquidation of Bernard L. Madoff
Investment Securities LLC and Bernard L.
Madoff*

Dated: New York, New York
May 12, 2014

By: /s/ Gabrielle J. Pretto
Barry R. Lax (blax@laxneville.com)
Brian J. Neville (bnevile@laxneville.com)
Gabrielle J. Pretto (gpretto@laxneville.com)
Lax & Neville, LLP
1450 Broadway, 35th Floor
New York, New York 10018
Telephone: (212) 696-1999
Facsimile: (212) 566-4531

Attorneys for Defendants

SO ORDERED ON May 13th, 2014:

/s/ STUART M. BERNSTEIN
HONORABLE STUART M. BERNSTEIN
UNITED STATES BANKRUPTCY JUDGE